IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

KATE ANN HULEATT,

Plaintiff,

v. Civil Action No:

NISSAN NORTH AMERICA, INC.

and

NISSAN MOTOR COMPANY, LTD.,

Defendants.

NISSAN NORTH AMERICA, INC.'S AND NISSAN MOTOR COMPANY, LTD'S NOTICE OF REMOVAL

NISSAN NORTH AMERICA, INC. ("NNA") and NISSAN MOTOR COMPANY, LTD. ("NML"), pursuant to 28 U.S.C. §§ 1441 and 1446, remove this action from the Circuit Court of Prince William County to the United States District Court for the Eastern District of Virginia, Alexandria Division, on the ground that there is jurisdiction under 28 U.S.C. § 1332. In support of this Notice of Removal, Defendants state:

1. This is a civil action for personal injuries received in a car crash.

2. The plaintiff, Kate Ann Huleatt, is and was at all times relevant a citizen of the Commonwealth of Massachusetts.

3. NNA is and was at all times relevant a California corporation with its principal place of business in Tennessee.

4. NML is and was at all times relevant a Japanese corporation with its principal place of business in Japan.

5. The amount in controversy exceeds $75,000.00 exclusive of interests and costs and is between citizens of different States and a citizen of a State and a citizen of a foreign state. This Court has original jurisdiction under 28 U.S.C. § 1332, and this matter may be removed to this Court by Defendants pursuant to the provisions of 28 U.S.C § 1441(a).

6. Removal is timely because this Notice of Removal was filed fewer than 30 days after NML received the Complaint on or about August 21, 2017 and fewer than 30 days after NNA received the Complaint on August 22, 2017.

7. The crash giving rise to this action occurred in Prince William County, Virginia, and suit was filed in Prince William County, Virginia. Therefore, venue properly lies in the Alexandria Division of the Eastern District of Virginia pursuant to 28 U.S.C. § 1441(a).

8. A copy of the Complaint, the only pleading filed to date, is attached as Exhibit A.

9. A true and correct copy of this Notice of Removal and a notice of that filing will be filed contemporaneously with the Clerk of the Circuit Court for Prince William County, in accordance with 28 U.S.C. § 1446(d). A copy of these documents will be served on all parties. A copy of the "Notice of Filing of Notice of Removal" is attached as Exhibit B.

For the reasons set forth above, NNA and NML remove this action to the United States District Court for the Eastern District of Virginia, Alexandria Division.

NISSAN NORTH AMERICA, INC. and
NISSAN MOTOR COMPANY, LTD.

By Counsel

/s/Jason M. Hart

Christopher C. Spencer (VSB No. 21878)
Direct Dial: (804) 285-5220
cspencer@spencershuford.com
Jason M. Hart (VSB No. 76818)
Direct Dial: (804) 285-5223

jhart@spencershuford.com
SPENCER SHUFORD LLP
6806 Paragon Place, Ste. 200
Richmond, VA 23230
Telephone: (804) 285-5200
Facsimile: (804) 285-5210

CERTIFICATE OF SERVICE

I hereby certify that a true copy of this document was sent via first class mail, postage prepaid, on this 5th day of September, 2017 to:

Joseph T. Musso, Esq.
jmusso@ashcraftlaw.com
Drew LaFramboise, Esq.
dlaframboise@ashcraftlaw.com
Ashcraft & Gerel, LLP
4900 Seminary Road, Suite 650
Alexandria, VA 22311
Counsel for Plaintiff Kate Ann Huleatt

/s/Jason M. Hart